

FILED

MAR - 3 2021

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY [Signature] DEPUTY

SEALED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

UNITED STATES OF AMERICA

§ INDICTMENT

v.

SA 21 CR 0102 DAE

JESSE MCKEE HOWARD,
Defendant

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[Violation: COUNT ONE: 18 U.S.C. §
2422(b), Attempted Coercion and Enticement
of a Minor;

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. § 2422(b)]

On or about November 12, 2020, in the Western District of Texas, Defendant,

JESSE MCKEE HOWARD,

did use the mail or any facility or means of interstate and foreign commerce, and within the special maritime and territorial jurisdiction of the United States, to knowingly persuade, induce, entice, and coerce any individual who had not attained the age of 18 years to engage in any sexual activity for which any person can be charged with a criminal offense, to wit: Sexual Abuse of a Minor, or attempted to do so, in violation of Title 18, United States Code, Section 2422(b).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE
[See Fed. R. Crim. P. 32.2]

I.

Coercion and Enticement of a Minor Violation and Forfeiture Statutes
[Title 18 U.S.C. § 2422(b), subject to forfeiture pursuant to
Title 18 U.S.C. § 2428 (a)(1) and (2)]

As a result of the foregoing criminal violation in Count One, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of certain property upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 2428(a)(1) and (2), which state:

Title 18 U.S.C. § 2428. Forfeitures

(a) **In general.** - The court, in imposing sentence on any person convicted of a violation of this chapter, shall order, in addition to any other sentence imposed and irrespective of any provision of State law, that such person shall forfeit to the United States-

- (1) such person's interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation; and
- (2) any property, real or personal, constituting or derived from any proceeds that such person obtained, directly or indirectly, as a result of such violation.


This Notice of Demand for Forfeiture includes but is not limited to the below described property:

- **One black Apple iPhone 11 Pro Max, bearing serial number G6TZR7C1N70L.**

A TRUE BILL

FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF
United States Attorney

By: 
for BETTINA RICHARDSON
Assistant United States Attorney
607 NW Loop 410, Suite 600
San Antonio, Texas 78216-5512